

1 the development of evidence in the case of Christofferson v. The
2 Church of Scientology, in Portland, Oregon by the testimony of
3 both Howard Schomer and Gerald Armstrong which is relevant to
4 the Motion to Compel and the appropriate scope of the deposition
5 of Gerald Armstrong herein. I explained that the transcripts of
6 the testimony would be unavailable on Monday, April 15, 1985.

7 5. I told Ms. Dragojevic that we believe that a two-week
8 continuation of the hearings would be sufficient, but, however,
9 I am having surgery on April 18, 1985 and will not return to the
10 office until early May, 1985. Therefore we are asking for a
11 continuation until May 6, 1985 to allow for my recuperation and
12 return to the office.

13 6. I further explained to Ms. Dragojevic that the matter
14 had already been off calendar for a number of months and that
15 her client was protected because of this court's order that his
16 deposition cannot be taken until the matter of the Motion to
17 Compel is resolved.

18 7. Ms. Dragojevic responded that she believed that the
19 court could continue the Motion for Protective Order concerning
20 the scope of the deposition without requiring a continuation of
21 the Motion to Compel. I explained that we were hoping to avoid
22 the necessity of two separate hearings.

23 8. Ms. Dragojevic further stated that she believed that
24 the hearing could be completed in forty-five minutes, therefore
25 not interfering with Mr. Randolph's appearance in Federal Court.
26 She concluded by saying that the matter had been pending a long
27 time and that her client was anxious as she is to resolve the
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1 matter. Therefore, she stated that she had to object to the Ex
2 Parte Application.

3 .9. On April 11, 1985 at 4:30 p.m., I telephoned Ms.
4 Dragojevic again and informed her that the Ex Parte Application
5 would be heard in Department 57 at 9:00 a.m. on April 12, 1985.

6 10. On April 11, 1985 at 9:50 p.m. I read the attached
7 Declaration of John G. Peterson over the telephone to Mr.
8 Peterson, who is in Portland, Oregon. Mr. Peterson confirmed
9 that this Declaration attached hereto is accurate. His executed
10 Declaration will be filed under separate cover on Monday,
11 April 15, 1985.

12 Executed this 11th day of April, 1985, in Los Angeles,
13 California.

14 I declare under penalty of perjury that the above is true
15 and correct.

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19 CHARLOTTE I. ASHMUN
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